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12 [Additional counsel listed on signature page]

13  
14 UNITED STATES DISTRICT COURT  
15 NORTHERN DISTRICT OF CALIFORNIA  
16 SAN FRANCISCO DIVISION

17 In re TFT-LCD (FLAT PANEL) ANTITRUST  
18 LITIGATION

Master Docket No. 07-m-1827 SI

19 This Document Relates To:

**STIPULATION AND [PROPOSED]  
ORDER EXTENDING PARTIES'  
TIME TO MOVE TO COMPEL AS  
TO CERTAIN DISCOVERY**

20 *Motorola Mobility, Inc. v. AU Optronics  
Corporation, et al., C 09-5840 SI*

21 *AT&T Mobility LLC, et al. v. AU Optronics  
Corp., et al., C 09-4997 SI*

22 *Target Corp., et al. v. AU Optronics Corp., et  
al., Case No. CV-04945 SI*

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1                   Defendants AU Optronics Corporation and AU Optronics Corporation America (“AUO”)  
 2 and Plaintiffs Motorola Mobility, Inc. (“Motorola”); AT&T Mobility, LLC, AT&T Corp., AT&T  
 3 Services, Inc., Pacific Bell Telephone Company, AT&T Operations, Inc., AT&T DataComm,  
 4 Inc., Southwestern Bell Co., (“AT&T”)<sup>1</sup>; Target Corp.; Sears Roebuck and Co.; Kmart Corp.; Old  
 5 Comp Inc.; Good Guys, Inc.; RadioShack Corp.; Newegg Inc. (collectively, the “Crowell  
 6 Plaintiffs”) stipulate as follows:

7                   WHEREAS Crowell Plaintiffs served a Joint Set of Interrogatories and Requests for  
 8 Production of Documents on AUO on November 2, 2011 (the “November 2 Discovery”) and  
 9 AUO provided Responses and Objections to the November 2 Discovery on December 5, 2011;

10                  WHEREAS AUO served a set of Interrogatories and Requests for Admission on Motorola  
 11 on July 8, 2011 (the “July 8 Discovery”) and Motorola provided Responses and Objections to the  
 12 July 8 Discovery on August 26, 2011 and Supplemental Responses and Objections on November  
 13 29, 2011;

14                  WHEREAS the parties have begun to meet and confer regarding certain of AUO’s  
 15 Responses and Objections to the November 2 Discovery, and require additional time to complete  
 16 the meet and confer process;

17                  WHEREAS the parties have begun to meet and confer regarding Motorola’s Supplemental  
 18 Responses and Objections to the July 9 Discovery, and require additional time to complete the  
 19 meet and confer process;

20                  WHEREAS AUO may wish to supplement certain of its Responses and Objections to the  
 21 November 2 Discovery upon completing the meet and confer process;

22                  WHEREAS AUO may produce additional documents responsive to the November 2  
 23 Discovery, and does not anticipate its ability to produce any such documents prior to the deadline  
 24 for filing motions to compel;

25                  WHEREAS Motorola may wish to supplement its Supplemental Responses and

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27                  <sup>1</sup> This stipulation is without prejudice to the Administrative Motion To Modify AT&T’s  
 Trial Schedule filed on December 8, 2011, or to Defendants’ opposition thereto.

1 Objections to the July 8 Discovery upon completing the meet and confer process;

2 WHEREAS the current deadline to file motions to compel in the above-captioned cases is  
3 December 15, 2011, and the parties have agreed to extend the deadline to move to compel further  
4 responses to the November 2 Discovery and the July 8 Discovery until January 20, 2012;

5 THEREFORE, AUO and Crowell Plaintiffs by their respective undersigned counsel,  
6 stipulate and agree as follows:

7 The deadline for Crowell Plaintiffs to move to compel further response to the November 2  
8 Discovery, and for AUO to move to compel further response to the July 8 Discovery shall be  
9 extended to January 20, 2012.

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1 Dated: December 15, 2011

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3 /s/ Joshua C. Stokes

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11 By /s/ Christopher A. Nedeau

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13 Attorneys for Defendants  
14 AU Optronics Corporation and  
15 AU Optronics Corporation America

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17 Pursuant to General Order 45, Part X-B, the filer attests that concurrence in the  
18 filing of this document has been obtained from the other signatories.

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20 IT IS SO ORDERED.

21 Dated: 12/16, 2011

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29 Hon. Susan Illston, United States District Judge